

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

NATIONAL RIFLE ASSOCIATION OF
AMERICA,

Plaintiff,

v.

ANDREW CUOMO, both individually and in his
official capacity; MARIA T. VULLO, both
individually and in her official capacity; and
THE NEW YORK STATE DEPARTMENT OF
FINANCIAL SERVICES,

Defendants.

Case No. 18 Civ. 566 (TJM)(CFH)

DECLARATION OF MARIA T. VULLO

MARIA T. VULLO declares, under penalty of perjury, that the following is true and correct:

1. I am the former superintendent of the New York State Department of Financial Services (“DFS”) and a defendant in this action. I respectfully submit this Declaration pursuant to the Court’s Order of August 8, 2019 [Dkt. 121], specifically in regards to the Court’s directive concerning the production of: 1) Documents concerning referrals of NRA-related matters to other government agencies [Dkt. 121 at pg. 27-30], and; 2) Documents and communications related to adverse actions against the NRA [Dkt 121 at pg. 49-50].

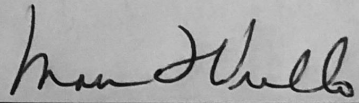
2. I understand that DFS is submitting a Declaration with respect to the agency’s search for documents in response to the Court’s Order.

3. After a diligent search, I do not have in my personal possession documents relevant to referrals of matters related to the NRA to other government agencies, or documents relevant to adverse or enforcement actions against financial institutions other than Lockton,

Chubb, and Lloyd's doing business or potentially doing business with the NRA.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 21, 2019



MARIA T. VULLO